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FOR THE NORTHERN DISTRICT OF NEW YORK**

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September 8, 2016

Honorable Thomas J. McAvoy
Senior United States District Judge
15 Henry Street
Binghamton, New York 13901

Re: USA v. Joseph Brown
Case No.: 07-CR-26

Dear Judge McAvoy:

Joseph Brown presents for admissions to violations numbers 2, 3 and 4 of the Petition filed August 16, 2016. These are all Grade C violations with a recommended sentencing guideline range of 3 to 9 months. Mr. Brown has been in custody since August 17, 2016 and seeks a sentence which is sufficient, but not greater than necessary to achieve the goal of federal sentencing. As noted in the letter of August 16, 2016, the violations of February 2015 and February 2016 were resolved by an admonishment and verbal warning and halfway house confinement. Upon his successful completion and discharged from the halfway house, he returned to his residence where his wife and college-age son reside. The family decided it was impractical for them to comply with the internet restrictions on the home and therefore, Mr. Brown rented a single room apartment. It was during this time that he obtained the unauthorized telephone and initiated a texting relationship which is the subject of this violation. It should be noted that the content of the relationship was not sexual or solicitous of conduct or images.

Mr. Brown understands that it was inappropriate and a violation of his terms of supervised release and he understands that a term of incarceration is likely to follow. He also intends with that understanding upon his release to start over again with an apartment and a renewed desire to comply with all of his conditions.

Respectfully submitted,

/s/ Gene V. Primomo

Gene V. Primomo
Assistant Federal Public Defender

GVP/lis